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Plaintiff
copy
2

IN THE UNITED STATES DISTRICT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED
JUL 17 2008
JUL 17 2008
MICHAEL W. DOBINS
CLERK, U.S. DISTRICT COURT

Jamal Akbar

Plaintiff)

vs.)

No. 08 C-0001 101

Nedra Chandler

Individually and official capacity,
Defendant.)

Honorable Judge Nordberg
Magistrate Judge Denlow

NOTICE OF FILING AND PROOF OF SERVICE

Andrew W. Lambertson
Attorney General Office
100 W. Randolph, 13th Floor
Chicago, IL 60601

Clerk of the Court
United States District Court
219 South Dearborn
Chicago, IL 60604

PLEASE TAKE NOTICE that on 7/15/ 08, the plaintiff named herein has filed with the Clerk of the United States District Court, Eastern Division a copy of the attached **MOTION FOR PRODUCTION OF DOCUMENTS & STATEMENT OF FACTS WITH EXHIBITS 1 - 13.** A true and correct copy of motion is hereby served upon at the above address by U.S. Mail.

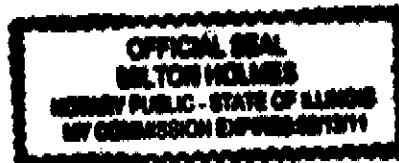
Respectfully submitted,

Jamal A. Akbar
Jamal A. Akbar, pro-se
11741 South Racine Ave
Chicago, IL 60643

Subscribed and Sworn to

Before me this 15th day
on July 2008

Michael W. Holmes
Notary Public



Plaintiff's copy
2

STATEMENT OF FACTS:

The plaintiff named in this cause of action pending before the bar, would like to submit the following documents of evidence to support the fact never at no time did plaintiff posed a threat or harm to the Dixon Correctional Center and/or defendant.

The Illinois Administrative Procedure Act provides that the record in a contested case **shall include:**

- o Proposed findings and exceptions, evidence received.

The term **shall** within regulation can be directory, **United States v. Reeb**, F 2d 381, cert. Denied 91 S. Ct. 1391. The defendant has the **heavy burden** of persuasion. **United States v. Concentrated Phosphate Export Assn., Inc.**, 393 U.S. 199, 203, 89 S. Ct. 361 21 L.Ed 2d 344 (1968).

1. Plaintiff worked for Illinois Department of Children and Family Services.
2. Plaintiff worked for Chicago Urban League, **CTA Green Line Project**.
3. Plaintiff worked with Urban League to open a shelter for the homeless.
4. Plaintiff worked for the City of Chicago, **Streets and Sanitation**.
5. Plaintiff networked with **Safer Foundation**.
6. Plaintiff volunteered for **Lisa Madigan**.
7. Plaintiff volunteered for **Dawson Technical Institute**.
8. Plaintiff worked with Department of Corrections with **Halfway House**.
9. Plaintiff's **landlord** shares her concerns with **IL. State Senator**.
10. Plaintiff donates food to **Ada S. McKinley Community Services**.
11. Plaintiff donates food to **Southwest Chicago PADS**.
12. Plaintiff has **Back-to-School Block Party** in Englewood Community
13. Plaintiff donates baked goods to seniors.

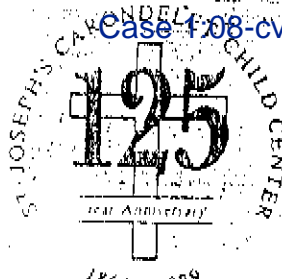
One of the fundamental rights guaranteed under the United States Constitution is the protection of the individual from arbitrary decision making of government. When government acts arbitrarily and capriciously against an individual, its decision-making becomes suspect. The evidence submitted herewith has legitimate bearing on matter before this Court.

Respectfully Submitted,

Jamal Akbar
Jamal Akbar, pro - se

FILED
JUL 17 2008
MICHAEL W. DOBBS
CLERK, U.S. DISTRICT COURT

08-CV-101



739 East 35th Street • Chicago, IL 60616-4115 • 312/624-7443 • Fax 312/624-7444

James B. McLaughlin
Executive Director

April 6, 1992

BOARD OF DIRECTORS

Leone Dattolo, Chairperson
Reverend Edwin M. Conway
Sarah Green Oye
William A. McIntosh
James B. McLaughlin
Joseph Mario Moreno
Terence W. Murchill
Ruth Mary O'Malley, C.S.J.
Donald W. Phillips
Anne Rice

Dear Jamal,

AUXILIARY PRESIDENTS

Mrs. Kay Larson, Guild
Mrs. Cathy Cahill, Guild
Mrs. Joy McDowell, Auxiliary

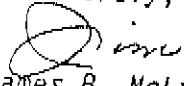
On behalf of the Board of Directors of St. Joseph's Carondelet Child Center, I am very pleased to inform you that the Staff of St. Joseph's Carondelet Child Center have been chosen to be the 1992 recipients of the "Friend of St. Joseph's Award".

This award is an expression of our gratitude for the support, commitment and dedication that the staff have given to the children, youth and programs of St. Joseph's.

This honour will be bestowed upon you and the other staff members on Friday, May 1, 1992. Invitations and details to follow. Please save the date!

My personal congratulations to you Jamal, on this special occasion.

Yours truly,


James B. McLaughlin
Executive Director

EXHIBITS/EVIDENCE/ 1thur 13



CHICAGO URBAN LEAGUE

Employment, Counseling and Training Department

226 West Jackson Boulevard Chicago, Illinois 60606 (312) 357-0470 Fax (312) 357-0470

To: [redacted]

From: [redacted]
Judy E. BrownSubject: [redacted]
[redacted]

June 16, 1995

[redacted]
[redacted]
[redacted]
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TO WHOM IT MAY CONCERN:

This is a letter of reference for Mr. Jamal Akabar. Mr. Akabar has assisted our efforts at site monitoring on the CTA Green Line Rehabilitation Project. His efforts have been exceptional and always correct. He has a good understanding of how to work in a politically tense situation. He has shown skill in working with diverse cultures and backgrounds. It has been a pleasure to work with Jamal.

I wish him well, and I would be glad to answer any questions regarding his scope of service on this project. Please feel free to call me with any inquiries at (312) 357-0470.

Sincerely,

Jules R. Packnett

United Way
Monitor Agency

EXHIBITS/EVIDENCE/ 1thur 13

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4510 S. MICHIGAN AVENUE CHICAGO, ILLINOIS 60653 3893 773/255-7400 FAX 773/255-7772

United Way
Member Agency
1995 Excellence Award
Recognized for Exemplary
Commitment to Children and
United Way Membership
Growth

CRC: dw

ST. 11-11

017 B

CITY OF CHICAGO
DEPARTMENT OF FINANCE
OFFICE OF THE COMPTROLLER
121 NORTH LA Salle STREET - ROOM 501 - CHICAGO, ILLINOIS 60601

AMERICAN HEART ASSOCIATION HEARTRIDE - AUGUST 10, 1994

CALL HEARTRIDE HOTLINE AT 848-4675 TO REGISTER

CITY OF CHICAGO

EMPLOYEE NUMBER **524355** 6324 **AKBAR JAMAL A** PAYROLL 3257 B

CHECK NUMBER **77-7742509081**

DEPARTMENT & SANITATION

EMPLOYEE DATE **08/10/94**

CURRENT PERIOD EARNINGS

DESCRIPTION	TYPE	AMOUNT
SUPPLEMENTAL		276.32
GROSS		1,316.00

CURRENT PERIOD TOTALS

GROSS	1,316.00
less Pension	103.33
less Benefits	
less Dep Comp	
TAXABLE GROSS	1,212.75
less Other Ded	281.05
NET PAY	931.70

YEAR TO DATE SUMMARY

PRE TAX GROSS	1,316.00
TAXABLE GROSS	1,212.75

DEDUCTIONS

FEDERAL TAX	103.33
STATE TAX	103.33
RETIARE	103.33
PENSION	103.33
DEFER	103.33



Jamal A. Akbar
Executive Director
DeJores' Place
512 W. 58th Street
Chicago, IL 60621

1. The Board of Directors of the
 County of Los Angeles
 (hereinafter referred to as the
 "Board")
 do hereby certify that the
 following is a true and correct
 copy of the original of the
 same as the same is on file
 in the office of the County Clerk
 of the County of Los Angeles
 at this date.
 County Clerk of the County of Los Angeles
 By: _____
 County Clerk of the County of Los Angeles

[illegible]
$$\begin{aligned}
 & \text{Let } \mathbf{A} = \begin{bmatrix} 1 & 2 & 3 \\ 2 & 3 & 4 \\ 3 & 4 & 5 \end{bmatrix} \text{ and } \mathbf{B} = \begin{bmatrix} 2 & 3 & 4 \\ 3 & 4 & 5 \\ 4 & 5 & 6 \end{bmatrix} \\
 & \text{Find } \mathbf{A} + \mathbf{B} \text{ and } \mathbf{A} - \mathbf{B} \\
 & \text{Solution: } \mathbf{A} + \mathbf{B} = \begin{bmatrix} 1+2 & 2+3 & 3+4 \\ 2+3 & 3+4 & 4+5 \\ 3+4 & 4+5 & 5+6 \end{bmatrix} = \begin{bmatrix} 3 & 5 & 7 \\ 5 & 7 & 9 \\ 7 & 9 & 11 \end{bmatrix} \\
 & \mathbf{A} - \mathbf{B} = \begin{bmatrix} 1-2 & 2-3 & 3-4 \\ 2-3 & 3-4 & 4-5 \\ 3-4 & 4-5 & 5-6 \end{bmatrix} = \begin{bmatrix} -1 & -1 & -1 \\ -1 & -1 & -1 \\ -1 & -1 & -1 \end{bmatrix}
 \end{aligned}$$
[illegible]
$$\begin{aligned} \frac{d^2 \theta}{dt^2} &= -\frac{g}{L} \sin \theta \approx -\frac{g}{L} \theta \\ \theta &= \theta_0 \cos \left(\sqrt{\frac{g}{L}} t \right) \end{aligned}$$

BDW/me
Enclosure



December 27, 2001

Jamal A Akbar
11741 S Racine Av
Chicago, IL 60643

Dear Jamal:

Thank you for circulating my petitions and helping me officially become a candidate for Illinois Attorney General. On December 10, after driving down to Springfield in the middle of the night and waiting for hours outside of the Illinois Board of Elections building, I became the first candidate in the state to file my petitions. It was important to me to file first because I know how hard you, and so many other volunteers, worked to help ensure my place on the ballot.

The response we have received thus far from our volunteers has been overwhelming; over 175,000 signatures have come into my office from all over the state. This only reinforces my belief that the strength of my campaign lies in the thousands of hard-working men and women who are willing to go door to door on my behalf. Unlike my opponent, I don't have millions of dollars of my own money to spend on television commercials. I am confident, however, that with your continued hard work over the next year we can overcome this obstacle, and march on to victory.

I wanted to take this opportunity to thank you for your help, and let you know that I look forward to working with you more in the future. If you need to contact me for any reason, don't hesitate to call my campaign offices at (312)755-9300.

Sincerely,

Lisa Madigan

EXHIBITS/EVIDENCE/ 1thru 13

62 W. Grand, Suite 400, Chicago, Illinois 60610 • 312.755.9300 • FAX 312.755.1376 • www.lisamadigan.org

A copy of our report is (or will be) filed and available for purchase from the State Board of Elections, Springfield, Illinois.
Contributors are not tax deductible. Paid for by Citizens for Madigan.

Dawson Technical Institute

CAREER PROGRAMS

December 14, 2005

To whom it may concern:

This letter is in reference to Jamal Akbar's verification as a Volunteer worker. Mr. Akbar has been working with me as a volunteer worker in the Dawson Technical Institute's Career Development Program.

His specific duties were to assist with the instruction to the students who are enrolled in the Career Development program. He was a Test Proctor.

I have personally known Jamal for over twenty years and we have worked in various capacities. He has always impressed me as a hard no-nonsense worker. I think that he would be a valuable asset to any employer.

He has served as Test Proctor for at least 2 years. If you should have any questions regarding this matter please feel free to contact me at 773 451-2138.

Sincerely,

Rausan T. Tarnir

Rausan T. Tarnir

EXHIBITS/EVIDENCE/ 1thur 13

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"Job Training That Works"

3901 South State Street • Chicago, Illinois 60609 • 773.451.2000

August 9, 2001

Ms. Mary Bennett
Department of Corrections
State of Illinois

Dear Ms. Bennett,

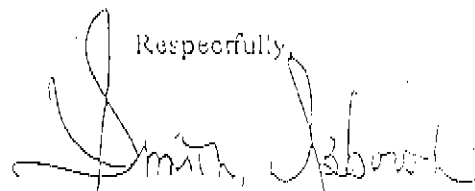
My name is Deborah J. Smith. I am a Senior Parole Agent for the Illinois Department of Corrections. It has come to my attention that Mr. Jamal A. Akbar, Proprietor of Delore's Place, a Halfway House for men, located at 512 West 58th Street, Chicago, Illinois 60621, has recently applied for state funding.

I respectfully recommend full state funding be approved for Delore's Place. I have had many contacts with Mr. Akbar and his facility through Department of Corrections parolees, and have found his facility to be well structured with excellent programs designed to successfully reintegrate the parolee back into society.

As a Senior Agent, I am familiar with several other state funded halfway houses located in Chicago that do not come close to comparing to the services provided by Delore's Place. Delore's Place offers close monitoring of residents, not only while they are at the facility, but also while they are off site at work, school, or medical facility, etc. Transportation is also provided as needed.

Delore's Place can provide a stable environment for homeless parolees and facilitate the non-violent monitoring process. We need more organizations determined and committed to providing the most advantages for the parolee to successfully reintegrate back into society. Delore's Place can provide those advantages.

Respectfully,



Deborah J. Smith
Senior Parole Agent
Department of Corrections
8007 S. Cottage Grove
Chicago, Illinois 60636

cc: Linda Dillon

EXHIBITS/EVIDENCE/ 1thur 13

September 12, 2005

To: The Honorable State Senator Mattie Brown
From: Catherine C. Long

Re: Property at 512 W. 58th Street
Chicago, Illinois

Dear Senator Hunter:

The intent of this reference letter is to attest to Mr. Jamal Akbar and Delores Place residency at the above address.

Mr. Akbar was the manager of Delores Place. The property was always clean inside and outside. The residents would speak very highly about the organization and its positive impact on the community. They still speak about the activities Mr. Akbar had in the community and related that because of his outreach the residents seemed to have came together, thereby, creating a better community.

Also, Delores Place brought a semblance of order to the community by the way they maintained the property.

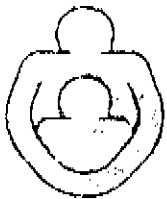
Rents was paid on time and proper notice was given when Mr. Akbar had to depart.

I firmly beleive that this organization is needed in the community and it will be an asset to you, senator, as well as to the people there.

Sincerely,

Catherine C. Long
Catherine Long
P.O. BOX 802524
Chicago, Illinois 60680
312-986-8739

EXHIBITS/EVIDENCE/ 1thur 13



ada s. m^ckinley
community services, inc.

vocational services
6033 south westwood street
chicago, illinois 60621
(773) 955-2900
fax (773) 955-2835

April 26, 2001

Mr. Jamal Akbar
Delores' Place
512 W. 58th Street
Chicago, IL 60621

Dear Mr. Akbar:

Thank you so much for sharing your donated goods with us. The bakery items were a nice treat for our clients (and staff) alike. And the Christmas decorations... we can't thank you enough.

Your generosity and thoughtfulness is much appreciated. We'll gladly take any future donations. Feel free to stop by anytime.

Occasionally, we acquire items in excess of what we need. Stop by or give me a call to see how we might return the favor. Thanks again!

Sincerely,

Nelly Gamboa
Director

NG:yb

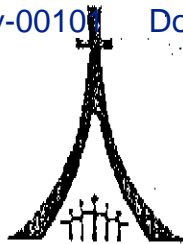
EXHIBITS/EVIDENCE/ 1thur 13

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member of united way of chicago/joint negro appeal

chicago association of commerce and industry/illinois association of rehabilitation facilities

20K



SOUTHWEST CHICAGO PADS

P. O. Box 29453

Chicago, IL 60629-0453

(773) 737-7070

January 20, 2003

Dear Mr. Akbar,

Thank you for your
donation of bread. It was
much appreciated and
enjoyed by all.

Good health & happiness
to you in the New Year.

Gratefully
Jackie

S. W. Chicago PADS

Permit # 219297492

Received Date: Jul 11, 2002 3:7:12

JAMAH AKBAR

505 W. 58TH

CHICAGO, IL 60621



City of Chicago
Department of Transportation
(312) 744-4652

JANICE CLARK 773-874-0820

ACTIVITY HOURS

Start no earlier than 9:00 AM. Stop no later than 8:00 PM. - Block Party

DATES

Aug 25, 2002 through Aug 25, 2002

ACTIVITIES

Block Party:

WARD 3

APPLICANT PHONE 773-483-3655

500 - 599 W 58 ST

Restrictions:

1. Maintain 10 foot fire lane at all times.
2. This permit is issued in accordance with Sec. 9-12-040 of the Municipal Code of Chicago and does not preclude any other ordinances which govern noise abatement, refuse, or any damage to any City facility.

EXHIBITS/EVIDENCE/ 1thur 13

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JAMAH AKBAR

Permit # 219297492

Counter

Page #: 1

0255784824

Harper Square Housing Coop
NORC Program
4800-4850 S. Lake Park
Chicago, IL 60615

August 4, 2006

Mr. Jamal A. Akbar, President
Delores' Place
11741 S. Racine Street
Chicago, IL 60643

Dear Mr. Akbar,

I am writing this letter to thank you for your weekly donations of baked goods to our Harper Square Seniors' group (NORC—Naturally Occurring Retirement Communities).

We want you to know how much we appreciate your kindness and generosity. Thank you again.

Sincerely,



Barbara E. Smith, Ph.D.
Acting NORC Coordinator